

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: CHRYSLER, LLC, et al,

Case No. 10 CV 2493

Debtor,

AFFIDAVIT OF STEPHEN PIDGEON IN SUPPORT  
OF MOTION FOR LEAVE TO WITHDRAW AS  
COUNSEL FOR ISLAND JEEP INCORPORATED  
(#26272) AND JOHN HINE PONTIAC (#68445)

STEPHEN PIDGEON, on oath and subject to the laws of perjury, as an officer of this court, with personal knowledge of the facts set forth below, now declares as follows:

On or about November 24, 2009, ISLAND JEEP INCORPORATED, by its authorized representative James Anderer, entered into a representation agreement with our firm Pidgeon & Donofrio GP. This agreement included specific language as to the termination of our services, to wit:

In the event that billing becomes more than 30 days overdue, or if we reach an impasse as to our legal advice because we have come to disagree on our strategy concerning your case, you agree that we may withdraw from your case with three days notice and substitute other counsel as you may instruct immediately.

Island Jeep Incorporated is now represented by the firm of Bellavia Gentile & Associates, LLP, who has instructed us to cease communications with Island Jeep directly as to certain matters. We therefore have reached an impasse as to our legal advice regarding this instant action, and we have become convinced that our representation of Island Jeep Incorporated 1) will be directly adverse to our other clients, and 2) is now materially limited by the client himself, and by our responsibilities to other members of our clients in this action. For the above-listed reasons, we respectfully request that this court grant us leave to withdraw our representation of Island Jeep Incorporated.

We also request leave to withdraw on behalf of JOHN HINE PONTIAC, and request that  
MOTION FOR LEAVE TO WITHDRAW AS COUNSEL TO ISLAND JEEP  
INCORPORATED AND JOHN HINE PONTIAC - 1

JOHN HINE PONTIAC be dismissed from this action as a party on appeal, pursuant to the direct request of the authorized representative of JOHN HINE PONTIAC, by and through counsel, the Law Offices of Michael J. Flanagan, directing us as follows:

This letter shall serve as our clients' formal request that your firm terminate all legal representation of John Hine or John Hine Pontiac, Inc. dba John Hine Dodge. Please promptly withdraw John Hine and John Hine Pontiac, Inc. dba John Hine Dodge as a party to the appeal referenced in your emails dated June 14 and 15, 2010, or any other proceeding pending before the United States District Court SDNY or any other forum.

As a consequence, we believe that this is sufficient authority to allow us to withdraw on behalf of the two foregoing parties, and sufficient reason to warrant the dismissal of JOHN HINE PONTIAC from this case, pursuant to F.R.C.P. 41.

Respectfully submitted this 23rd day of June, 2010.

//STEPHEN PIDGEON //  
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